

EXHIBIT 22

WORKFORCE INVESTMENT NOTICE:99-24

SUBJECT: Youth Councils

DATE: March 28, 2000

I. BACKGROUND

Section 117(h)(1) *There shall be established, as a subgroup within each local board, a youth council appointed by the local board, in cooperation with the chief elected official for the local area.*

In compliance with the Workforce Investment Act of 1998, local Workforce Investment Boards (WIBs), with the guidance of local elected officials, will establish Youth Councils as a subgroup within each local board. **The Youth Council is a subgroup within the local WIB, not an independent body.** Each Youth Council will be encouraged to focus on youth planning, oversight, and policy that prepare youth to enter the workforce or to advance to post-secondary education or other occupational skills training. Youth Councils will provide the necessary development and oversight of youth programs within each Area. Local Boards should strive to have their Youth Council in place within 30 days of the chartering of the Local Area's Workforce Investment Board.

Youth Councils will work with their local WIB in developing parts of the local plan that pertain to youth. In working with their local boards, the Youth Council is responsible for ensuring that partnerships are developed with the various systems that serve youth, such as education, employment, community services, businesses, and juvenile justice to create a more efficient and comprehensive delivery system. The partnership between the local youth council and the private sector should promote linkages between academic and occupational learning and exposure to opportunities for career exploration and skill development.

II. YOUTH ELIGIBILITY

Under WIA, eligible youth are defined as low-income individuals between the ages of 14-21. Individuals who fall between 14-18 are considered Younger Youth, while individuals that fall between 19-21 are considered Older Youth. Under WIA, eligible youth can be characterized by one or more of the following: a high school dropout, homeless, deficient in basic literary skills, runaway or foster child, pregnant or parenting, an offender, and an individual who requires additional assistance to complete an education, or to secure and hold employment.

Along these lines, youth can fall into eight targeted groups: individuals who are school

dropouts, basic skills deficient, whose educational attainment is one or more grade levels below the grade level appropriate to the age of the individual, pregnant or parenting youth, individuals with disabilities, including learning disabilities, homeless or runaway youth, offenders, or youth that face serious barriers to employment and identified by each local WIB. Five percent (5%) of the total participant population enrolled under Title I youth programs in each local area may be individuals who do not meet the minimum income criteria to be considered eligible youth if the individuals are in one of the aforementioned eight target groups. The WIA encourages that youths who are served receive a depth of service that makes a difference in their lives. It is the local WIBs decision to decide on number of youths served versus depth of service.

III. ROLES AND RESPONSIBILITIES

Section 117 of the WIA outlines the roles and responsibilities of the Youth Council. As outlined in the Act, the Youth Council is responsible for:

- (A) developing the portions of the local plan relating to eligible youth, as determined by the chairperson of the local board;
- (B) recommending eligible providers of youth activities, to be awarded grants or contracts on a competitive basis by the local board to carry out the youth activities; and;
- (C) conducting oversight with respect to the eligible providers of youth activities, in the local area;
- (D) coordinating youth activities authorized under section 129 in the local area;
- (E) other duties determined to be appropriate by the chairperson of the local board.

Since the Youth Council members have expertise in youth issues, the local board at any time may delegate responsibilities to the Youth Council to take advantage of their expertise.

For example, assistance from individuals, as deemed necessary by either the Youth Council or local WIB, should be provided in the writing of the youth components of to the Local 5-year Plan

IV. MEMBERSHIP REQUIREMENTS

The WIA states that the membership of each youth council—

(A) shall include

- (i) members of the local WIB with special interest or expertise in youth policy;
- (ii) representatives of youth service agencies, including juvenile justice and local law enforcement agencies;

(iii) representatives of local public housing authorities;

(iv) parents of eligible youth seeking assistance under this subtitle;

(v) individuals, including former participants, and representatives of organizations, that have experience relating to youth activities; and representatives of Job Corps; and

(B) may include such other individuals as the chairperson of the local board, in cooperation with the chief elected official, determines to be appropriate.

The State Workforce Investment Office will require each youth council to fill at least two seats with business members, particularly those with strong relationships with local schools. Such business members could satisfy category (i) of the aforementioned membership requirements. Each local WIB is also strongly encouraged to fill at least two slots with individuals from secondary and postsecondary education institutions. These members could satisfy categories (i), "members of the local board", (ii), "representatives of youth service agencies", and (v), "representatives of organizations, that have experience relating to youth activities".

In all cases, the membership of the Youth Council must include individuals who are high profile members of the community, as well as reflective of the makeup of the general population, as appropriate. Youth Councils are vital to the success of WIA and vital to the future workforce of the State.

If, the local WIB cannot fill any essential seat on the Youth Council, a detailed letter of explanation must be sent to the State Workforce Investment Office. Once the membership seats of the Youth Council are filled, the SWIO will review the Youth Council membership as part of its certification of local WIBs.

Youth Council members are required to meet the same conflict of interest standards as regular WIB members. This is essential because Youth Council members have a role in recommending programs and funding, as well as participate in discussions and influence decisions.

The size of the Youth Council does matter. A membership balance needs to be achieved that ensures all the key organizations are represented while keeping the group at a manageable size so that active participation is encouraged.

V. RHODE ISLAND ACADEMIC PERFORMANCE MEASURES

Rhode Island, through the Workforce Investment Act, will prioritize strengthening the connection between academic excellence and success in the workplace. The Rhode Island Department of Education (RIDE) has established standards for youth that define what students should know and be able to do at certain threshold points in their schooling in order to be considered proficient in reading, writing, math and science. RIDE is utilizing a variety of assessment tools to measure these academic content

levels. Local WIBs are encouraged to develop programs that assist youth in meeting the state's academic and other standards.

A Local Workforce Investment Board and its Youth Council may elect to use the results to measure the academic achievement of in school youth served through WIA. Local WIBs and Youth Councils are encouraged to collaborate with the State Department of Education and local school officials and parents to develop a process to provide appropriate reporting information.

Local WIBs and the Youth Councils are encouraged to form partnerships between out-of-school youth providers and adult educators to allow access assessment services, assessment training, and data collection services.

Developing strategies to assess the value of WIA intervention with youth will require more linkages and collaboration with the RIDE. As this coordination evolves, the SWIO will develop guidance to achieve common goals for youth that are in the State's education system and also participants in WIA youth programs.

VI. YOUTH PERFORMANCE MEASURES

Youth Councils, in collaboration with the local WIB, will be responsible for meeting the specific performance standards negotiated by the USDOL. The local WIBs and their Youth Councils will award contracts to local youth services providers based on the extent to which they provide services to youth to meet the USDOL negotiated performance standards and also strive to achieve the state performance standards for Title I of the Carl Perkins Vocational and Applied Technology Education Act.

The WIA has identified core performance standards for youth served under Title I funding. These core standards for youth are:

14-18 Younger Youth

- (I) attainment of basic skills and, as appropriate, work readiness or occupational skills;
- (II) attainment of secondary school diplomas (or) their recognized equivalents; and
- (III) placement and retention in post secondary education or advanced training, or placement and retention in military service, employment, or qualified apprenticeships.

19-21 Older Youth

- (I) entry into unsubsidized employment;
- (II) retention in unsubsidized employment 6 months after entry into the employment;

- (III) earnings received in unsubsidized employment 6 months after entry into the employment; and
- (IV) attainment of a recognized credential relating to achievement of educational skills, which may include attainment of a secondary school diploma or its recognized equivalent, or occupational skills, by participants who enter unsubsidized employment, or by participants who are eligible youth at age 19 through 21 who enter postsecondary education, advanced training, or unsubsidized employment.

At this time, the State will have no additional performance measures for local WIBs.

The USDOL performance measures will be used to evaluate the WIBs progress in meeting the guidelines of WIA Title I and eligible youth services. Local WIBs and Youth Councils should work with all local youth agencies and service providers to develop an applicable consensus of performance measures.

VI. CUSTOMER SATISFACTION

The WIA of 1998 and the Wagner-Peyser Act identify customer satisfaction survey information provided by youth program participants and parents as an important factor in the final grant award determination. Each WIB's Plan must include written policies and procedures for advertising, evaluating, and awarding contracts to ensure fairness and consistency, including customer satisfaction results in awarding contracts.

VII. YOUTH PROGRAM CRITERIA, DESIGN AND ELEMENTS

Local Youth Councils, along with the WIBs, are responsible for ensuring that services to Title I eligible youth are comprehensive and that services are coordinated with all participating state and local agencies offering youth programs. In section 129 of the WIA, required youth program design, program elements, and additional requirements are outlined and required of local areas. The local elements and requirements for youth programs require that the following be available to all eligible youth that enter the program within the local area:

- provide an objective assessment of the academic levels, skills levels, and service needs of each participant;
- develop service strategies for each participant that shall identify an employment goal, appropriate achievement objectives, and appropriate services for the participant;
- preparation for postsecondary educational opportunities, in appropriate cases strong linkages between academic and occupational learning;
- preparation for unsubsidized employment opportunities, in appropriate cases; effective connections to intermediaries with strong links to the job market and local and regional

employers;

- tutoring, study skills training, and instruction, leading to completion of secondary school, including dropout prevention strategies;
- alternative secondary school services, as appropriate;
- summer employment opportunities that are directly linked to academic and occupational learning;
- as appropriate, paid and unpaid work experiences, including internships and job shadowing;
- occupational skills training, as appropriate;
- leadership development opportunities, which may include community services and peer-centered activities encouraging responsibility and other positive social behaviors during non-school hours, as appropriate;
- supportive services; and
- adult mentoring for the period of participation and a subsequent period, for a total of not less than 12 months, which may include intergenerational programs which use older individuals to act as mentors to youth for guidance and support to learn basic work skills.

Each local WIB and the Youth Council may add program elements that would be beneficial to the population they serve to this list in their comprehensive Plan.

In order to identify effective providers, providers should be asked to:

- Describe prior experience working with disadvantaged youth;
- Describe prior experience in operating employment and training and educational programs;
- Provide previous program data to indicate past successes;
- Demonstrate knowledge of community resources available;
- Describe current or proposed linkages with community organizations, state agencies, employers, etc.;
- Provide letters of support and;

- Demonstrate knowledge of the business community.

Partner programs and other youth programs in the local area should be available for applicants who do meet the WIA Title I youth program eligibility requirements but can't be served due to lack of resources. Local WIBs and their Youth Councils will serve as many WIA Title I eligible youth as possible based on resources.

Youth providers will be recommended by the local areas Youth Council to the full WIB. In making program and funding recommendations, local Youth Councils will take into account the proposed operator's past success, training designs, cost effectiveness, relationships with the business community, relationships with local service networks, and ability to offer skills certified by the business community. Operators must also demonstrate financial capability and attest to compliance with all applicable laws.

VIII. COORDINATION WITH JOB CORPS

A memorandum of understanding will be developed with the Job Corps. The MOU will focus on sharing information, referrals, and providing services to eligible youth. Local WIBs are encouraged to invite Job Corps representatives to serve on the Youth Council. WIA staff should work with Job Corps representatives and community liaisons to coordinate services in accordance with Section 153 of the Workforce Investment Act.

IX. RHODE ISLAND YOUTH STRATEGIES

Rhode Island has developed several strategies to help guide local WIBs and the Youth Councils:

- Each Area shall have at least one One-Stop Center located in their region at the time of implementation. The *netWORKri* system offers the necessary link between academic and occupational learning and connections to the job market and employers.
- The State strongly encourages local Youth Councils to review local education and workforce linkages and to consider knowledgeable business people and community leaders for membership.
- Year-round youth activities should reflect designs that have shown effectiveness in preparing youth for the workforce.
- Youth Councils are strongly encouraged to promote business representation on the council and to promote partnerships with community businesses. In order to develop a partnership between the private business community and the Youth Councils, a positive, proactive approach will be required.
- WIBs and the Youth Councils are encouraged to partner with other grantees and services providers eligible to receive funds through such programs as Adult Literacy, Welfare to Work, Wagner-Peyser, Carl Perkins, and other federal, state, and labor education grants.

- Local One-Stops or youth contractors should be able to provide comprehensive access to the Internet to provide opportunities for youth to access career information and training and employment information.
- Local WIBs are encouraged to set up individual assessments of out-of-school youth in order to determine if they can participate in youth programs, adult programs, or both.
- Youth Councils are encouraged develop a design framework that provides objective assessments of academic and occupational skill levels of participating youth, individual service strategies that reflect assessment and identify career goals, preparation for postsecondary educational opportunities, linkages between academic and occupational learning, and connections to employers and job markets.

X. GENERAL POPULATION

At the time of application, each youth should have an assessment of their eligibility for the program and their employment and academic background and capabilities. Case Managers should conduct an initial assessment and develop an individual service strategy plan that will identify the services needed to attain an employment goal, academic/skill needs, and/or barriers to employment. The service strategy plan may include one or more of the program elements listed below:

- A. Tutoring, study skills training, and instruction leading to completion of secondary school, including dropout prevention strategies;
- B. Alternative secondary school services, as appropriate;
- C. Summer employment opportunities that are directly linked to academic and occupational learning, as appropriate;
- D. Paid and unpaid work experiences, including internships and job shadowing;
- E. Occupational skill training, as appropriate;
- F. Leadership development opportunities, which may include community service and peer-centered activities encouraging responsibility and other positive social behaviors during non-school hours, as appropriate;
- G. Supportive Services;
- H. Adult mentoring for the period of participation and a subsequent period for a total of not less than 12 months;
- I. Follow-up services for not less than 12 months after the completion of participation, as

appropriate; and

J. Comprehensive guidance and counseling which may include drug and alcohol abuse counseling and referral, as appropriate.

Youth not eligible for the WIA program should be referred to other agencies and services that can accommodate their needs.

XI. OBJECTIVE ASSESSMENT

A variety of assessment techniques can be used that includes, but are not limited to, structured interviews, paper and pencil tests, performance tests, behavioral observations, interest and /or attitude inventories, career guidance instruments, aptitude assessments, and basic educational tests. Youth may be given a pre-employment work maturity skill test to measure their aptitude of workplace dynamics such as methods for finding a job, writing a resume, and/or appropriate work, and workplace attitude. All youth should be given a pretest to assess basic academic skill levels in reading and in math.

The assessment should measure the following areas:

- Barriers to Employment
- Behavior patterns affecting employment potential;
- Educational background/skills;
- Family history;
- Financial resources/needs;
- Influential family members, teachers, community members;
- Interests and aptitudes (general and specific to non-traditional occupations for women);
- Motivation;
- Occupational skills;
- Personal employment knowledge;
- Supportive service needs; and
- Work history.

XII. INDIVIDUAL SERVICE STRATEGY

From an initial objective assessment, an individualized service strategy will be developed for each youth. The service strategy plan will facilitate the tracking of participant progress. This service strategy plan is designed to be a continuous plan of action that will identify participant academic/employment strengths and weakness as well as future goal attainment. Youth will be provided information on the entire range of services provided by the program, and all youth will be provided with referral sources and information. The plan will outline services to be provided aimed at improving their immediate and long-term educational and employment needs. *netWORKri* offices may also provide links to the job market and local and regional employers, as well as other employment and training referral resources.

XIII. SPECIAL YOUTH POPULATIONS

Youth with special barriers to employment, as well as priority and exception populations as described in WIA section 129(c) (4) and (5) should be identified through the initial assessment. After their program eligibility has been determined, they should be provided the necessary services that address their particular need.

XIV. GRANT AWARD CRITERIA

The WIA Youth Council, will ensure that youth providers that are awarded grants will meet the following criteria:

- ADA compliance;
- Certifications/licensure associated with training completion;
- Curriculum (course) outlines for training activities;
- Debarment and suspension status;
- Demonstrated effectiveness;
- Description of training facility;
- Fiscal controls, experience, and capabilities;
- Identify a grievance policy;
- Knowledge of Child Labor Laws and Fair Labor Standards Act;
- Knowledge of local demographics;
- Linkages with existing resources;
- Offer Equal Employment Opportunities.
- Qualifications of instructors;

- Reasonableness of cost;
- Student/Instructor ratio; and
- Success rate based on enrollment and completion.